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May 9, 2024

Via ECF

The Hon. Renée Marie Bumb
Chief United States District Judge
USDC, District of New Jersey
Mitchell H. Cohen Building & U.S.
Courthouse
4th & Cooper Streets, Courtroom 3D
Camden, NJ 08101

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation,*
No. 1:19-md-02875-RBK-SAK (D.N.J.)**

Dear Chief Judge Bumb:

I write in response to Mr. Slater's letter to the Court of May 9, 2024, in which Mr. Slater reports a conflicting family vacation at the time of the June 25, 2024 case management conference, and states that Defendants "do not consent" to his request to change the date of the conference for this reason. That omits relevant details of the parties' communications. Mr. Slater wrote to defense counsel on May 7, 2024, advised that he would be away the week of June 25 and the following week, and asked if Defendants would agree to request that the Court move the conference "earlier than the week of June 24."

Defendants responded the same day, stating: "Unfortunately our side has conflicts and travel the earlier weeks in June leading up to the conference and many of us have already moved things around to be there on the 25th. We are prepared to go forward on the 25th and would like to keep the date." Defendants also proposed setting a meet-and-confer call for Monday or Tuesday, May 12 or 13. Mr. Slater then filed the present letter with the Court.

To be clear, Defendants do not oppose rescheduling the case management conference in light of Mr. Slater's family vacation. But, as conveyed on May 7, Defendants cannot accommodate Plaintiffs' request to move it "earlier than the week of June 24" due to existing scheduling conflicts, including conflicts for Defense Lead Counsel. The parties also require sufficient time to draft and reach agreement on the joint status report requested by the Court. Accordingly, if the case management conference is to be moved, Defendants request the Court provide available dates following Mr. Slater's return from his family vacation. Defendants also have no objection to allowing attendance by Zoom on June 25, 2024, if Plaintiffs prefer remote attendance to rescheduling the case management conference to a later date.

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Defendants are also available for a telephone or Zoom conference regarding the scheduling issue if necessary. We appreciate the Court's attention to this matter.

Very truly yours,

/s/ Victoria Davis Lockard

Victoria Davis Lockard

cc: All counsel of record (via ECF)